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September 21, 2011

Lisa K. Kreager, M.D.
29 South Hampton Avenue
Towson, MD 21204

FILE COPY

Re: Susie Sanders

Dear Dr. Kreager:

I have been appointed as the Best Interest Attorney for Susie. A copy of the Order Appointing Counsel for Minor Child is enclosed for your records.

It is my understanding that Susie is currently in counseling with you. I would appreciate arranging a time when we may speak regarding Susie, and your forwarding to me a copy of her records prior to that time so that I may review them in advance of our conversation.

In the meantime, to avoid any potential misunderstandings, I do not waive any of Susie's privilege and you may not release her records to anyone else (even if subpoenaed) and may not discuss her matter with anyone else.

Thank you.

Very truly yours,

Christopher W. Nicholson

Enclosure

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August 9, 2010

VIA ELECTRONIC TRANSMISSION

Ms. Calli Woodward
6 Telegraph Drive
Baltimore, Maryland 21206

Re: Brown v. Meadow

Dear Ms. Woodward:

As per your request in our telephone conversation this morning, I am faxing the list of documents and information Mr. Nicholson needs to prepare for the trial on August 17th, 2010 to your home fax number.

Also, Mr. Nicholson has agreed to meet with you tomorrow evening at 5:15 p.m. in our office to accommodate your work schedule. Our address is at the top of this sheet. Please feel free to communicate us if you need directions to the office.

Documents/Information:

1. Copies of any papers or documents that you would like Mr. Nicholson to review, such as report cards, medical records, or correspondence with teachers.
2. Names and addresses for Terri's medical doctor, dentist, psychiatrist, psychologist, counselor and/or therapist.
3. Names, addresses and telephone numbers of three (3) individuals who have observed Terri's interactions with you.
4. Names, addresses and telephone numbers of any coaches, tutors, scout leaders or other individuals with whom Terri interacts for extra-curricular activities.

Also, Mr. Nicholson will need to meet with Terri individually. We need to make arrangements for this meeting as soon as possible.

Should you have any further questions, please do not hesitate to communicate with me.

Sincerely,

Mary-jo Mather,
Legal Assistant

March 11, 2011
9:30 AM (Mrs. Berry)
2:30 PM (Mr. Berry)

AGENDA FOR MEETING WITH MR. AND MRS. BERRY

1. Lay witnesses
 - A. Confirm names, addresses and scope of knowledge
 - B. Would like three witnesses for each child.

2. Can the parties agree upon a third party to act as a Parent Coordinator?
 - A. Topics for the Parent Coordinator.
 - B. Use of a Priest to determine standards for religious issues.

3. Updates regarding each child since last meeting:
 - A. Mike
 - B. Frank
 - C. Edith

- D. Steffi
- 4. Review of the girls' current Report Cards and school performance.
- 5. Larry Apple, LCSW
 - A. How often does he see/treat the children?
 - B. Which of the children does he treat?
 - C. Why name and documents never provided to CWN previously?
- 6. Has anyone else seen/treated the children that have not been provided?
- 7. Any additional information to be provided?

PROPOSED QUESTIONS FOR MARY AND JOHN SMITH, MINOR CHILDREN

Paul Smith, Plaintiff/Counter-Defendant, by Christopher W. Nicholson and Turnbull, Nicholson & Sanders, P. A., his attorney submits these Proposed Questions for Mary and John Smith:

1. What is your name, address and date of birth?
2. What school do you attend and what grade are you in now? What school did you previously attend and what grade were you in when you left that school?
3. What are your favorite subjects and how are your grades?
4. Do you know the difference between telling the truth and telling a lie? What is the difference?
5. What happens if you tell a lie?
6. Are your mother and father divorced? For how long?
7. With whom do you live? How often do you see your father?
8. When did you last see your father? Do you know why you are limited in seeing your father? Why?
9. Topics to be explored:
 - A. The move from Maryland to Pennsylvania.
 - B. What you were told before the move? What were you told about why you were moving?
 - C. Who else lives with you or spends overnights with you in Pennsylvania?

D. Are you able to communicate with your Mother? Are you able to communicate with your Father?

E. Did you like living in Maryland? Did you have friends in Maryland? Did you have family (cousins) that live in Maryland?

F. What types of things did you do with your Mother prior to the move? What types of things did you do with your Father prior to the move?

G. What are your hobbies?

10. Have you discussed your parents' case with either of them?
11. Have you discussed your parents' case with anyone?
12. Who told you that you were coming to Court today? What did they tell you?

Christopher W. Nicholson
Turnbull, Nicholson & Sanders, P.A.
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Suite 202
Towson, Maryland 21204
(410) 339-4100
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cnicholson@tnsfamilylaw.com

CERTIFICATE OF SERVICE

I hereby certify that on this ___ day of February, 2011, I hand delivered a copy of the foregoing Proposed Questions for Mary and John Smith to:

Christopher W. Nicholson

Waiver of Privilege

-Very rarely should you waive privilege. Do it only after serious discussions with the child's therapist because most therapists believe that this will not only undermine their relationship with the child, but also affect the child's ability to trust anyone in an intimate relationship in their future.

CAPTION

WAIVER OF PATIENT/PSYCHOLOGIST PRIVILEGE

Keith N. Schiszik, Esq., Court-appointed attorney for the minor child, hereby notifies the Court that after interviewing the mental health professional with whom the minor child is under treatment, privilege on behalf of the child is hereby waived, it being in the child's best interests to have the mental health professional, Janet Carson, Psy.D., testify in this matter.

Keith N. Schiszik, Esq.
Counsel for the minor child

Certificate of Service. etc.

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

Frank Smith

Plaintiff

v

Case No: 07-1772

Mary Smith

Defendant

Petition of the Child's Attorney for INTERIM Counsel Fees

Comes now Keith N. Schiszik, Esq., Child's Attorney, who requests interim payment of fees for services rendered and says as follows in support of the request:

1. On the 1st day of November, 2007, the Court appointed Undersigned Counsel to represent the minor child in these proceedings.

2. Since that time, Counsel has diligently represented the child and has met with the child and the parents, interviewed other witnesses, and has discussed the matter with Counsel for the parents. Counsel initiated discovery and has thus far been to court several times on behalf of the child. Attached is a detailed billing history for services rendered through February 1, 2008, demonstrating all effort expended by the undersigned attorney on behalf of the child thus far.

3. Undersigned Counsel has expended _____ hours of professional time representing the minor child, and charges \$ _____ per hour, which is fair and reasonable based upon his experience in these matters and reputation in the legal community. In addition, his paralegal has

expended _____ hours of paraprofessional time at her rate of \$ _____ per hour. The total fee through February 1, 2008 is \$ _____.

4. The parties were each ordered by the Court to deposit \$ _____ into the trust account for the child's attorney, and they have complied with the Court's Order.

5. In addition to the fees charged, undersigned Counsel paid for the deposition transcripts in this case in the amount of \$ _____. He wishes to receive reimbursement for these advances..

WHEREFORE, your Child's Attorney prays:

1. That the Court award him Counsel fees in the amount of \$ _____ for services rendered from November 1, 2007, through February 1, 2008 at the rate of \$ _____ per hour. (This amount in includes the costs advanced as set forth in the billing history).

2. That the Court authorize the undersigned Child's Attorney to withdraw the funds held in Trust and apply the funds toward the interim fees awarded herein.

3. That each party be required to deposit an additional \$ _____ into the Child's Attorney's trust account to serve as a deposit toward anticipated costs of future services.

4. And for such other and further relief as to this Honorable Court may seem just and proper.

DAY & SCHISZIK

By: _____
Keith N. Schiszik, Esq.
322 West Patrick Street
Frederick, MD 21701
(301) 662-8811
Guardian Ad Litem

Certificate of Service

I hereby certify that on this ____ day of _____, 200__, I mailed a copy of the foregoing Petition of the Child's Attorney for Interim Attorney's Fees to James M. Clapp, Esq., Counsel for the Plaintiff, at 200 N. Court Street, Frederick, MD 21701 and to Lorraine M.B. Prete, Esq., Counsel for the Defendant, at 19 N. Court Street, Frederick, Md 21701.

Keith N. Schiszik, Esq.

IN THE CIRCUIT COURT FOR FREDERICK COUNTY, MARYLAND

Frank Smith

Plaintiff

v

Case No: 07-1772

Mary Smith

Defendant

ORDER OF COURT GRANTING INTERIM COUNSEL FEES
FOR THE CHILD'S ATTORNEY

Upon consideration of the **Petition of the Child's Attorney for Interim Counsel fees**, it is on this _____ day of _____, 200__, by the Circuit Court for Frederick County, Maryland;

ORDERED, that Interim fees for the Child's Attorney are hereby awarded in the amount of \$ _____ for services rendered and costs advanced between November 1, 2007 and February 1, 2008; and it is further

ORDERED, that the funds held in Trust by the Child's Attorney may be released from Trust and applied toward the amount awarded herein; and it is further,

ORDERED, that the Plaintiff pay directly to the Trust account of Keith N. Schiszik, Esq. the additional sum of \$ _____ within 60 days of the date of this Order, and the Defendant pay directly to the Trust account of Keith N. Schiszik, Esq. the additional sum of \$ _____ within 60 days of the date of this Order, as additional deposits toward services which will be rendered by the Child's Attorney in the future.

Judge of the Circuit Court

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

XXXXXXXX XXXXXXXX

Plaintiff

v.

Case No. XXXX FL

XXXXXXXX XXXXXXXX

Defendant

PETITION FOR ATTORNEYS FEES

Comes now _____, Esquire, attorney for the minor children, XXXX
XXXXXXXX, born X/X/XX and XXXXXX XXXXXXXX, born X/X/XX and petitions the
Court for payment of attorneys fees and costs. Counsel represents as follows:

1. That on _____, _____, I was appointed by this Court as Best
Interest Attorney for XXXXX and XXXXXXXX XXXXXXXX to represent the best interests of
said children in the above-captioned case in all matters relating to custody and visitation; such
representation shall include consideration of the waiver (or not) of the
psychiatric/psychological privilege of the aforesaid minor children, and may include requests
for counseling and psychiatric evaluation.

2. That, pursuant to said appointment, I performed legal services necessary to
represent the best interests of the minor children.

3. That, to date, the amount of time expended in this matter is X.X hours.

4. That my hourly rate is \$ _____ per hour, but for this appointment is
reduced to \$ _____ per hour.

5. That the attorney's fees due and owing are \$ _____. A bill for said
services are attached hereto and made a part hereof. Counsel in this matter have received said
bill.

6. That, at the time this Honorable Court entered the Order appointing me as the Best Interest Attorney for the minor children, the Plaintiff was ordered to advance to his attorney the sum of \$_____ to be placed in the Registry of the Court within 30 days of the date of the Order.

7. That, at the time this Honorable Court entered the Order appointing me as the Best Interest Attorney for the minor children, the Defendant was ordered to advance to her attorney the sum of \$_____ to be placed in the Registry of the Court within 30 days of the date of the Order.

8. That said monies have been placed in the Registry of the Court.

9. That the Order (Best Interest Attorney) stated that the award of fees shall be reserved for future determination by the Court, both as to amount and assessment between the parties.

WHEREFORE, the undersigned prays as follows:

1. That this Honorable Court grant her Petition for Attorney's Fees; and
2. That this Honorable Court order the Court Registry pay to _____, Esquire the sum of \$_____; and
3. That this Honorable Court determine how the remaining balance of \$_____ is to be paid; and
4. For such other and further relief as this Court deems just and proper.

Respectfully submitted,

Donna E. Van Scoy, Esquire (XXXXXX)
50 West Montgomery Avenue, Suite 105
Rockville, Maryland 20850
(301) 610-0110
Best Interest Attorney

CERTIFICATE OF SERVICE

I hereby certify that on the ____ day of _____, _____ a copy of the foregoing PETITION FOR ATTORNEYS FEES was mailed, postage pre-paid to: XXXX X. XXXXX, Esquire *Attorney for the Plaintiff* at Address, Suite XX, City, State Zip Code, and XXXXXXXX XXXX, Esquire, *Attorney for the Defendant* at Address, City, State Zip Code.

Donna E. Van Scoy, Esquire

IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, MARYLAND

XXXXXXXXXXXXXXXXXX

Plaintiff

v.

Case No. XXXX FL

XXXXXXXXXXXXXXXXXX

Defendant

ORDER

Upon consideration of the Petition for Attorney's Fees submitted by _____, Esquire, Best Interest Attorney for XXXXX XXXXXXXXXXXX and XXXX XXXXXXXXXXXX, minor children of the parties, and any Opposition thereto, it is this _____ day of _____, 2007, by the Circuit Court for Montgomery County, Maryland,

ORDERED, that _____, Esquire is hereby awarded attorney's fees in the amount of \$ _____; and it is further

ORDERED, that the Court Registry be ordered to pay the sum of \$ _____ to _____, Esquire.

ORDERED, that the Plaintiff is to pay the sum of \$ _____ to _____, Esquire, from the Court Registry; and it is further

ORDERED, that the Defendant is to pay the sum of \$ _____ to _____, Esquire, from the Court Registry; and it is further

ORDERED, that the remaining monies be _____

JUDGE, Circuit Court for
Montgomery County, Maryland

This is a proper Order to be passed:

Domestic Relations Master